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October 7, 2024

VIA ECF

Hon. Paul A. Engelmayer
United States District Court,
Southern District of New York
40 Foley Square,
Room 2201
New York, NY 10007

Re: **Sealing Motion for Jane Street's Opposition to Defendants' Motion to Compel,
Jane Street Group, LLC v. Millennium Management LLC, et al., No. 1:24-cv-02783**

Dear Judge Engelmayer:

On behalf of Plaintiff Jane Street Group, LLC ("Jane Street"), and pursuant to Your Honor's Individual Rule 4(B)(2) (Sealing/Redaction Requiring Court Approval), we write to request permission to redact and seal certain materials that contain Jane Street's proprietary, commercially sensitive, or trade secret information in Jane Street's Opposition to Defendants' Motion to Compel. Within three business days, Jane Street will file a public redacted version of its Opposition. Jane Street will also file a sealed version of Jane Street's Opposition with highlighting to indicate the proposed redactions, and an explanation of why Jane Street seek redaction of the highlighted materials.

The materials sought to be filed under seal contain competitively sensitive information regarding Jane Street's business operations and confidential, proprietary, and trade secret information, and intellectual property. This information should not be made public, as Jane Street maintains this information as confidential and its secrecy is a significant competitive asset to Jane Street. Jane Street has spent significant sums of money to develop, use, and protect this confidential information and making it public would place Jane Street at a competitive disadvantage. *See Playtex Prods., LLC v. Munchkin, Inc.*, 2016 WL 1276450, at *11 (S.D.N.Y. Mar. 29, 2016) (granting redaction request for qualitative market research because "[p]laintiffs would be competitively harmed if they were revealed."). Additionally, Jane Street believes that

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Defendants may seek to seal some or all of Jane Street's Opposition to Defendants' Motion to Compel and the Exhibits. This Court has previously ordered similar information filed under seal. *See, e.g.*, Dkts. 157, 169, 181, 196.

Jane Street will meet and confer with Defendants regarding the sealing or redactions of Jane Street's Opposition and the Exhibits, and within three business days, Jane Street will submit proposed redactions to the sealed documents, providing the public with ample information to understand the dispute. *See Dependable Sales & Serv., Inc. v. TrueCar, Inc.*, 311 F. Supp. 3d 653, 666 (S.D.N.Y. 2018) (permitting proposed redactions where a "member of the public reviewing the parties' redacted submissions . . . would have information sufficient to understand the parties' arguments and the Court's adjudication").

Respectfully submitted,

/s/ Deborah K. Brown
Deborah K. Brown

Attorney for Plaintiff Jane Street Group, LLC

cc: All Counsel of Record (Via ECF)